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*Attorneys for Plaintiff
Miriam Goldberg*

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Miriam Goldberg,) Case No.: 3:24-cv-4525
Plaintiff,)
v.)
TeachBK, Inc., *et al.*,)
Defendants.)
)

) **SECOND JOINT STIPULATION AND**
)

) **[PROPOSED] ORDER TO ENLARGE**
)

) **DEADLINE TO COMPLETE**
)

) **MEDIATION**
)

Plaintiff Miriam Goldberg and Defendants Ilya Kiselev, and Andrey Burtsev (collectively, “Defendants”) hereby agree and stipulate as follows:

The Court referred this case to mediation on February 28, 2025. [ECF No. 47]. Pursuant to the ADR Local Rule 6.4(c), mediation was to be completed by May 29, 2025. Prior to that deadline, on April 24, 2025, counsel for Defendants moved to withdraw from this case. [ECF No. 50]. Because of that fact, the parties stipulated to enlarge the deadline to complete mediation through July 31, 2025, which the Court adopted. [ECF Nos. 52 & 53]. Defendants

1 are now proceeding pro se, [see ECF No. 54], and have recently met and conferred on
 2 discovery matters as required by the Court [ECF No. 56]. To ensure that the parties can
 3 meaningfully resolve disputed discovery matters and further develop the issues and facts prior
 4 to conducting mediation, the parties have agreed to enlarge the deadline by an additional 90
 5 days, through October 29, 2025, to complete mediation.

6 Accordingly, the parties stipulate and jointly request that the Court enlarge the deadline
 7 to complete mediation through October 29, 2025.

8 IT IS SO STIPULATED.

9 Dated: July 11, 2025

Respectfully submitted,

10 SLATER LEGAL PLLC

11 By:/s/ James M. Slater

12 James M. Slater (admitted *pro hac vice*)

13 Attorney for Plaintiff Miriam Goldberg

14 _____
 15 /s/ Andrey Burtsev (w/ express permission)
 16 Andrey Burtsev, Defendant

17 _____
 18 /s/ Ilya Kiselev (w/ express permission)
 19 Ilya Kiselev, Defendant

ATTESTATION OF CONCURRENCE

20 I, James M. Slater, am the ECF User whose ID and password are being used to file this
 21 **JOINT STIPULATION.** I attest that, pursuant to United States District Court, Northern
 22 District of California L.R. 5-1(i)(3), concurrence in the filing of this document has been
 23 obtained from Defendants. I declare under penalty of perjury that the foregoing is true and
 24 correct.

25 Dated: July 11, 2025

SLATER LEGAL PLLC

26 By:/s/ James M. Slater

27 James M. Slater (admitted *pro hac vice*)

[PROPOSED] ORDER

Pursuant to the parties' stipulation, and good cause appearing, the Court ORDERS that mediation must be completed no later than October 29, 2025.

Dated: _____

HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE